

**UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

COLLISION SCIENCES, INC.

Petitioner /
Counter-Respondent,

v.

BOSCH AUTOMOTIVE SERVICE
SOLUTIONS LLC,

Respondent /
Counter-Petitioner

Civil Action No. 2:25cv11026

Hon. Judge Jonathan J.C. Grey

Hon. Mag. Judge Elizabeth A. Stafford

**COUNTER PETITION TO CONFIRM AND
ENTER JUDGMENT UPON ARBITRATION AWARD**

Respondent / Counter-Petitioner Bosch Automotive Service Solutions, LLC (“Bosch”), by its attorneys, Dykema Gossett PLLC, files this Counter Petition to Confirm, pursuant to 9 U.S.C. § 9, the Final Award of the Arbitrator in International Centre for Dispute Resolution, American Arbitration Association Case No. 01-21-0016-2306, issued on January 10, 2025, and enter judgment on the Final Award pursuant to 9 U.S.C. § 13. In support of this Petition, Bosch relies on the reasons below and those set forth in the accompanying combined Memorandum in Opposition to Collision Sciences, Inc.’s Petition to Vacate or Modify Arbitration Award, and in Support of Bosch’s Petition to Confirm the Arbitration Award.

1. Respondent / Counter-Petitioner Bosch is a limited liability company, organized and existing under the laws of the State of Delaware, with its principal place of business in Michigan.

2. Petitioner / Counter-Respondent Collision Sciences, Inc. (“CSI”), is an Ontario, Canada corporation with its principal place of business in Mississauga, Ontario, Canada.

3. The jurisdiction of this Court is invoked by CSI under 28 U.S.C. § 1332(c) (sic). For its Counter Petition, Respondent/Counter-Petitioner invokes jurisdiction of this Court under 9 U.S.C § 9, and under 28 U.S.C. § 1332(a)(2) as the parties are diverse and the amount in controversy exceeds \$75,000.

4. The underlying matter between the parties proceeded to binding arbitration, resulting in the entry of the Arbitrator’s Final Award dated January 10, 2025. In this Award, Bosch was awarded \$111,501.80 in damages representing the cost of a software audit. The Award further entered a permanent injunction against CSI, which, among other things, prohibited CSI and its employees, owners, officers, contractors, and agents, from using or possessing any version of the Bosch CDR Tool Software, and required CSI to expunge from its database all records relating to crash data derived or sourced in any way from the Bosch CDR Tool Software on or after July 9, 2019.

5. Respondent/Counter-Petitioner now seeks the entry of a judgment upon the Arbitration Award in accordance with the Final Award of the Arbitrator, the underlying agreements of the parties, and 9 U.S.C. §9. Respondent/Counter-Petitioner further seeks confirmation of the Arbitration Award by this Court because the Award was entered within the proper authority of the Arbitrator.

WHEREFORE, Respondent/Counter-Petitioner respectfully requests that this Court enter its judgment confirming and enforcing the Arbitration Award, and award Respondent/Counter-Petitioner additional costs and attorneys' fees associated with this action.

Respectfully submitted,

Dated: May 1, 2025

By: s/ Steven McMahon Zeller

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*Attorneys for Respondent Bosch
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CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will provide notification to all counsel of record.

By: *s/ Steven McMahon Zeller*
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